

U.S. Department of Housing and Urban Development

Public and Indian Housing

Efforts to Outcomes[®] (ETO)
(Case Management System for the Disaster Housing
Assistance Program (DHAP- Ike))

Privacy Impact Assessment

November 4, 2010

Document Endorsement

I have carefully assessed the Privacy Impact Assessment (PIA) for the [Efforts to Outcome System](#). This document has been completed in accordance with the requirement set forth by the [E-Government Act of 2002](#) and [OMB Memorandum 03-22](#) which requires that "Privacy Impact Assessments" (PIAs) be conducted for all new and/ or significantly altered IT Systems, and Information Collection Requests.

ENDORSEMENT SECTION

Please check the appropriate statement.

- The document is accepted.**
 The document is accepted pending the changes noted.
 The document is not accepted.

Based on our authority and judgment, the data captured in this document is current and accurate.

/s/ Iyabo Morrison

SYSTEM OWNER

IYABO MORRISON, PUBLIC AND INDIAN
HOUSING, PROGRAM SUPPORT DIVISION
U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT

11/5/10

Date

/s/ Anthony Hebert

PROGRAM AREA MANAGER

ANTHONY HEBERT, ACTING DIRECTOR,
PROGRAM SUPPORT DIVISION– OFFICE OF
PUBLIC HOUSING AND VOUCHER PROGRAMS,
U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT

11/5/10

Date

/s/ Donna Robinson-Staton

DEPARTMENTAL PRIVACY ACT OFFICER

DONNA ROBINSON-STATON
OFFICE OF THE CHIEF INFORMATION OFFICER
U. S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT

11/9/10

Date

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FINAL

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT PRIVACY IMPACT ASSESSMENT (PIA) FOR:

EFFORTS TO OUTCOMES® (ETO)

**OMB Unique Identifier for IT Systems: N/A
and PCAS #: N/A**

November 4, 2010

NOTE: See Section 2 for PIA answers, and Section 3 for Privacy Act Officer's determination.

SECTION 1: BACKGROUND

Importance of Privacy Protection – Legislative Mandates:

HUD is responsible for ensuring the privacy and confidentiality of the information it collects on members of the public, beneficiaries of HUD programs, business partners, and its own employees. These people have a right to expect that HUD will collect, maintain, use, and disseminate identifiable personal information only as authorized by law and as necessary to carry out agency responsibilities.

The information HUD collects is protected by the following legislation and regulations:

- [Privacy Act of 1974, as amended](http://www.usdoj.gov/foia/privstat.htm) affords individuals the right to privacy in records that are maintained and used by Federal agencies. (See <http://www.usdoj.gov/foia/privstat.htm>; see also [HUD Handbook 1325.1 at www.hudclips.org](http://www.hudclips.org));
- Computer Matching and Privacy Protection Act of 1988 is an amendment to the Privacy Act that specifies the conditions under which private information may (or may not) be shared among government agencies. (See <http://www.usdoj.gov/foia/privstat.htm>);
- [Freedom of Information Act of 1966, as amended](http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm) (http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm) provides for the disclosure of information maintained by Federal agencies to the public, while allowing limited protections for privacy. See also [HUD's Freedom of Information Act Handbook \(HUD Handbook 1327.1 at www.hudclips.org\)](http://www.hudclips.org));
- [E-Government Act of 2002](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=107_cong_public_laws&docid=f:publ347.107.pdf) requires Federal agencies to conduct Privacy Impact Assessments (PIAs) on its electronic systems. (See http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=107_cong_public_laws&docid=f:publ347.107.pdf; see also the summary of the E-Government Act at http://www.whitehouse.gov/omb/egov/pres_state2.htm);
- [Federal Information Security Management Act of 2002](http://www.fis.gov) (which superseded the Computer Security Act of 1987) provides a comprehensive framework for ensuring the effectiveness of information security controls over information resources that support

Federal operations and assets, etc. See also the codified version of Information Security regulations at [Title 44 U.S. Code chapter 35 subchapter II](http://uscode.house.gov/search/criteria.php) (<http://uscode.house.gov/search/criteria.php>); and

- [OMB Circular A-130, Management of Federal Information Resources, Appendix I](http://www.whitehouse.gov/omb/circulars/a130/appendix_i.pdf) (http://www.whitehouse.gov/omb/circulars/a130/appendix_i.pdf) defines Federal Agency responsibilities for maintaining records about individuals.

Access to personally identifiable information will be restricted to those staff that has a need to access the data to carry out their duties; and they will be held accountable for ensuring privacy and confidentiality of the data.

What is the Privacy Impact Assessment (PIA) Process?

The Privacy Impact Assessment (PIA) is a process that evaluates issues related to the privacy of personally identifiable information in electronic systems. See background on PIAs and the 7 questions that need to be answered, at: <http://www.hud.gov/offices/cio/privacy/pia/pia.cfm>. Personally identifiable information is defined as information that actually identifies an individual, e.g., name, address, social security number (SSN), or identifying number or code; or other personal/ sensitive information such as race, marital status, financial information, home telephone number, personal e-mail address, etc. Of particular concern is the combination of multiple identifying elements. For example, knowing name + SSN + birth date + financial information would pose more risk to privacy than just name + SSN alone.

The PIA:

- Identifies the type of personally identifiable information in the system (including any ability to combine multiple identifying elements on an individual);
- Identifies who has access to that information (whether full access or limited access rights); and
- Describes the administrative controls that ensure that only information that is necessary and relevant to HUD's mission is included.

Who Completes the PIA?

Both the program area System Owner and IT Project Leader work together to complete the PIA. The System Owner describes what personal data types are collected, how the data is used, and who has access to the personal data. The IT Project Leader describes whether technical implementation of the System Owner's requirements presents any risks to privacy, and what controls are in place to restrict access of personally identifiable information.

When is a Privacy Impact Assessment (PIA) Required?

1. **New Systems:** Any new system that will contain personal information on members of the public requires a PIA, per OMB requirements (this covers both major and non-major systems).

2. Existing Systems: Where there are significant modifications involving personal information on members of the public, or where significant changes made to the system may create a new privacy risk, a PIA is required.

3. Information Collection Requests, per the Paperwork Reduction Act (PRA): Agencies must obtain OMB approval for new information collections from ten or more members of the public. If the information collection is both a new collection and automated, then a PIA is required.

What are the Privacy Act Requirements?

Privacy Act. The [Privacy Act of 1974](http://www.usdoj.gov/foia/privstat.htm), as amended (<http://www.usdoj.gov/foia/privstat.htm>) requires that agencies publish a Federal Register Notice for public comment on any intended information collection. Privacy Act Systems of Records are created when information pertaining to an individual is collected and maintained by the Department, and is retrieved by the name of the individual or by some other identifying number, symbol, or other identifying particular assigned to an individual. The [E-Government Act of 2002](#) requires PIAs for electronic systems as well as information collection requests that are automated. So, there is a relationship between the new PIA requirement (when automation is involved) and the long-standing Privacy Act System of Records Notices (for both paper-based and automated records that are of a private nature). For additional information, contact the Departmental Privacy Act Officer in the Office of the Chief Information Officer.

Why is the PIA Summary Made Publicly Available?

The E-Government Act of 2002 requires that the analysis and determinations resulting from the PIA be made publicly available. The Privacy Advocate in HUD's Office of the Chief Information Officer (OCIO) is responsible for publishing the PIA summary on HUD's web site. See: <http://www.hud.gov/offices/cio/privacy/pia/pia.cfm>.

SECTION 2 – COMPLETING A PRIVACY IMPACT ASSESSMENT

Please submit answers to the Chief Privacy Officer in the Office of the Chief Information Officer (OCIO). If any question does not apply, state Not Applicable (N/A) for that question, and briefly explain why it is not applicable.

Program Area: Public and Indian Housing Office of Public Housing and Voucher Programs

Subject matter expert in the program area: Iyabo Morrison, Public and Indian Housing, Program Support Division, Department of Housing and Urban Development, (202) 402-4166.

Program Area Manager: Anthony Hebert, Acting Director, Program Support Division– Office of Public Housing and Voucher Programs, Department of Housing and Urban Development, (202) 402-7387.

IT Project Leader: Iyabo Morrison (Program/contact information reflected above)

For IT Systems:

- **Name of system:** Efforts to Outcomes® (ETO)
- **PCAS #:** N/A, this is not a OMB/Working Capital Fund (WCF) project
- **OMB Unique Project Identifier #:** N/A, this is not a OMB/WCF project
- **System Code:** ETO

For Information Collection Requests:

- **Name of Information Collection Request:**
- **OMB Control #:**

Question 1: Provide a general description of the system that describes.

The following questions are intended to define the scope of the information in the system (or information collection), specifically the nature of the information and the sources from which it is obtained.

- What is the personal information being collected?** (e.g. name, address, gender/sex, race/ethnicity, income/financial data, employment history, medical history, Social Security Number, Tax Identification Number, Employee Identification Number, FHA Case Number)

ETO will contain identifying information about program participants and their household members including: name, social security number, Federal Emergency management Agency (FEMA) ID number of the eligible head of household member, birth date, current telephone number and current address. In addition, the files contain sensitive information about education level, race/ ethnicity, gender/sex, employment and training needs, elderly and disabled status, social service needs and service referrals. The client provides information regarding education level, criminal records, income /financial data, employment and training, disability status, medical history information, and social service needs as information that the case manager may use to assess any barriers to permanent housing attainment and/or increased self-sufficiency. The case manager uses this information in order to

identify appropriate service referrals, to help prepare clients for the eventual end of the DHAP- Ike in March 2011.

b. From whom is the information collected (i.e., government employees, contractors, or consultants)?

Information is collected from anyone FEMA deems authorized to participate in DHAP-Ike.

c. What is the functionality of the system and the purpose that the records and/or system serve?

On September 28, 2008, HUD and FEMA executed an Interagency Agreement (IAA) under which HUD acts as the servicing agency for administering the Disaster Housing Assistance Program- Ike (DHAP- Ike). Pursuant to FEMA's grant authority, grants are provided to local PHAs to administer DHAP- Ike on behalf of FEMA. Under DHAP- Ike, public housing authorities (PHAs) will make rental assistance payments on behalf of eligible families to participating landlords for the duration of the program, ending on March 31, 2011. In order to prepare the family for this eventuality, FEMA requires that case management services be provided for the entire duration of DHAP- Ike. The objectives of these services are greater self-sufficiency and permanent housing status for participating individuals and families. This will include assisting program participants identify non-disaster supported housing solutions such as other affordable housing options that may be available for income eligible families. PHAs are required to report case management outputs and outcomes through ETO, which is the DHAP- Ike case management reporting system for the duration of the program.

ETO captures pertinent data relating to family self-sufficiency, permanent housing status and service needs. ETO supports DHAP- Ike grantees in their case management efforts, HUD staff in their program monitoring activities and providing required reports to FEMA in fulfillment of its responsibilities outlined within the IAA. The system was procured through contract number: C-DEN-02332. The system allows DHAP- Ike grantees to implement and report case management services for FEMA's DHAP- Ike program, for which HUD is the servicing agent. This system will assist with implementation and administration of rental housing assistance and case management services to individuals and families whose residences have been rendered uninhabitable as a result of the disasters caused by Hurricanes Gustav and Ike.

The personal and sensitive information, listed above, is provided by the client to the case manager in order to document recipient demographic information, but more expressly for the purpose of identifying community or social services that the client may need assistance accessing. If a "No Response" is given by the client, the case manager cannot assist with accessing social services within the community. However, this does not necessarily affect the receipt of rental assistance through the DHAP- Ike.

d. How information is transmitted to and from the system;

Data is transferred and uploaded on a weekly basis from the Public and Indian Housing Center system, Disaster Information System to ETO.

e. What are the interconnections with other systems.

There is no interconnection between ETO and any other HUD systems.

f. What specific legal authorities, arrangement, and/or agreement authorize the collection of information (i.e. must include authorities that cover all information collection activities, including Social Security Numbers)?

For the DHAP- Ike program, families are deemed eligible by FEMA and privacy protected information is transmitted from FEMA to HUD with the proper administrative, physical, and technical controls in place to secure, protect, and preserve the confidentiality of information in identifiable form. Further, in the 2009 Consolidated Appropriations Act (P.L. 111-8) Congress determined that the Disaster Housing Assistance Programs (DHAP), administered by HUD, shall be considered a “program of the Department of Housing and Urban Development” under section 904 of the McKinney Act for the purposes of income verification and matching.

Question 2: Type of electronic system or information collection.

	Yes	No
A. If a new electronic system (or one in development) (implemented after April 2003, the effective date of the E-Government Act of 2002)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does the system require authentication?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the system browser-based?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the system external-facing (with external users that require authentication)? Members of the public are not granted access to ETO data. Access to ETO by DHAP- Ike grantees, or public housing agencies and their agents, is restricted to only the households served by the PHA, rather than the entire database – which reflects only the data they have entered into the system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B. If this is existing electronic system has the system	Yes	No
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undergone any changes (since April 17, 2003)? If an existing system, when was the system developed? _____	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Do the changes to the system involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If yes, please explain:		

C. For your new and/or existing electronic system, please indicate if any of the following changes have occurred: Mark any of the following conditions for your existing system that OMB defines as a “trigger” for requiring a PIA or PIA update (if not applicable, mark N/A):	
N/A	Conversion: When paper-based records that contain personal information are converted to an electronic system
N/A	From Anonymous (Non-Identifiable) to “Non-Anonymous” (Personally Identifiable): When any systems application transforms an existing database or data collection so that previously anonymous data becomes personally identifiable
N/A	Significant System Management Changes: When new uses of an existing electronic system significantly change how personal information is managed in the system. (Example #1: when new “relational” databases could combine multiple identifying data elements to more easily identify an individual. Example #2: when a web portal extracts data elements from separate databases, and thereby creates a more open environment for exposure of personal data)
N/A	Merging Databases: When government databases are merged, centralized, matched, or otherwise significantly manipulated so that personal information becomes more accessible (with special concern for the ability to combine multiple identifying elements)
N/A	New Public Access: When <u>new</u> public access is given to members of the public or to business partners (even if the system is protected by password, digital certificate, or other user-authentication technology)
N/A	Commercial Sources: When agencies systematically incorporate into databases any personal data from commercial or public sources (ad hoc queries of such sources using existing technology does not trigger the need for a PIA)
N/A	New Inter-agency Uses: When agencies work together (such as the federal E-Gov initiatives), the lead agency should prepare the PIA
N/A	Business Process Re-engineering: When altering a business process results in significant new uses, disclosures, or additions of personal data
N/A	Alteration in Character of Data: When adding new personal data raises the risks to personal privacy (for example, adding financial information to an existing database that contains name and address)

D. If an Information Collection Request (ICR): Is this a <u>new</u> Request that will collect data that will be in an <u>automated</u> system? Agencies must obtain OMB approval for information collections from 10 or more members of the public. The E-Government Act of 2002 requires a PIA for ICRs only if the collection of information is a <u>new</u> request and the collected data will be in an <u>automated</u> system.	
<input checked="" type="checkbox"/>	Yes, this is a new ICR and the data will be automated
	No, the ICR does not require a PIA because it is not <u>new</u> or <u>automated</u>
<input checked="" type="checkbox"/>	Comment: The information collection requirements imposed by HUD in this document have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA) of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2577-0258. In accordance with the PRA, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

Question 3: Explain by Line of Business why the personally identifiable information being collected? How will it be used?

Mark any that apply:

Homeownership:

	Credit checks (eligibility for loans)
	Loan applications and case-binder files (via lenders) – including borrower SSNs, salary, employment, race, and other information
	Loan servicing (MIP collections/refunds and debt servicing for defaulted loans assigned to HUD)
	Loan default tracking
	Issuing mortgage and loan insurance
	Other (specify):
	Comment:

Rental Housing Assistance:

	Eligibility for rental assistance or other HUD program benefits
<input checked="" type="checkbox"/>	Characteristics on those receiving rental assistance (for example, race/ethnicity, # of children, age)
	Property inspections
<input checked="" type="checkbox"/>	Other (specify): If there is a Conversion of DHAP- Ike families to the Housing Choice Voucher program, this information will be utilized.
<input checked="" type="checkbox"/>	Comment: Households receiving rental assistance under DHAP- Ike are required by FEMA to participate in case management services. The ETO system is used to provide case management and document household information. Most information is provided by the client and is not explicitly required as a condition of receiving rental

	assistance.
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Grants:

	Grant application scoring and selection – if any personal information on the grantee is included
	Disbursement of funds to grantees – if any personal information is included
	Other (specify):
	Comment:

Fair Housing:

	Housing discrimination complaints and resulting case files
	Other (specify):
	Comment:

Internal operations:

	Employee payroll or personnel records
	Payment for employee travel expenses
	Payment for services or products (to contractors) – if any personal information on the payee is included
	Computer security files – with personal information in the database, collected in order to grant user IDs
	Other (specify):
	Comment:

Other lines of business (specify uses):

Question 4: Will you share the information with others? (e.g., another agency for a programmatic purpose, internal HUD application/module or outside the government)?

Mark any that apply:

<input checked="" type="checkbox"/>	Federal agencies? FEMA
<input checked="" type="checkbox"/>	State, local, or tribal governments?
<input checked="" type="checkbox"/>	Public Housing Agencies (PHAs) or Section 8 property owners/agents?
<input type="checkbox"/>	FHA-approved lenders?
<input type="checkbox"/>	Credit bureaus?
<input type="checkbox"/>	Local and national organizations?
<input checked="" type="checkbox"/>	Non-profits?
<input type="checkbox"/>	Faith-based organizations?
<input type="checkbox"/>	Builders/ developers?

	HUD module/application? (specify the module(s)/application(s) name)
X	Others? (specify): Social Solutions, Inc.
X	Comment: HUD administers the DHAP- Ike through an IAA with FEMA. As is required by the IAA, HUD will provide regular reports to FEMA of program activities. Information from ETO will be reported in the aggregate for this purpose. Other users of the data include PHAs who are the DHAP grantees responsible for providing case management services to families through their grant agreement. Many PHAs contract out this responsibility to local providers either through contracts or Memorandums of Understanding (MOUs), including non-profits, to perform case management services. As a result, much of the data is gathered and input by local non-profits or case management providers who represent users of the system.

Question 5: Can individuals “opt-out” by declining to provide personal information or by consenting only to particular use (e.g., allowing their financial information to be used for basic rent eligibility determination, but for not for sharing with other government agencies)?

X	Yes, they can “opt-out” by declining to provide private information or by consenting only to particular use. Other sensitive information such as disability status, criminal history, as well as medical and employment history is provided by the client to the case manager at the client’s discretion. To the extent that a client provides this information, the case manager can help access services within the local community including job training, job placement and disability resources. However, if a client is not interested in accessing services through case management and does not need them to achieve self-sufficiency, a “No Response” could be provided. This would not terminate their DHAP- Ike rental assistance as long as they are compliant with other case management requirements such as periodic meetings to update information and ensure the family is making progress toward self-sufficiency as needed. While the client must actively participate in case management with the goal of achieving permanent housing by March 2011, to the extent that services are not sought, clients are not required to provide specific information.
X	No, they can’t “opt-out” – all personal information is required Personally identifiable information such as name, social security number, current address and FEMA ID is provided by FEMA to HUD for the purpose of validating duplicate housing assistance (to determine if a family deemed eligible by FEMA is receiving housing assistance from any HUD program). A client may not “opt-out” of this personally identifiable information, which is used to determine DHAP- Ike eligibility status.
X	Comment: Participants are required to participate in case management services in order to receive rental subsidy benefits under the DHAP- Ike. However, participants are not required to provide specific sensitive information.

If Yes, please explain the issues and circumstances of being able to opt-out (either for specific data elements or specific uses of the data): _____

**Question 6: How will the privacy of the information be protected/ secured?
What are the administrative and technological controls?**

Mark any that apply and give details if requested:

X	System users must log-in with a password users create individualized passwords. They are not automatically generated by the system.
X	<p>When an employee leaves:</p> <ul style="list-style-type: none"> • How soon is the user ID terminated? 24 hours • How do you know that the former employee no longer has access to your system? (explain your procedures or describe your plan to improve): After the PHA notifies that a case manager has been terminated, the user-id is de-activated and the password is changed to ensure that access will not be granted to the system. A follow up notice is sent to the person who requested the de-activation to confirm the action.
X	<p>Are access rights selectively granted, depending on duties and need-to-know? If Yes, specify the approximate # of authorized users who have either:</p> <ul style="list-style-type: none"> • Full access rights to all data in the system: There are eighteen users with “corporate” or full access rights to the system: Five Information Pathwaves staff (case management contract staff), ten HUD Headquarters staff, and three Social Solutions staff (ETO software developer). • Limited/restricted access rights to only selected data: 578
X	<p>Are disks, tapes, and printouts that contain personal information locked in cabinets when not in use? (explain your procedures, or describe your plan to improve):</p> <p>Records are maintained on a secure computer network protected by a firewall. Access to the system is restricted to authorized users only, requires a user ID and is password protected. HUD and Social Solutions, Inc. (software provider) staff will maintain manual files without unique identifiers, information that does not allow an individual to be linked to the information in the file in the same manner as personally identifiable information, with the proper administrative, and physical, controls required to secure, protect, and preserve the integrity of the system required data as required under the Privacy Act of 1974. Hard copy files are stored by grantees (PHAs) in locations that are locked and safeguarded, with access granted only to a limited number of authorized users.</p> <p>Information is archived electronically and stored. Records will be retained and disposed of in accordance with the General Records Schedule included in HUD Handbook 2228.2, appendix 14, items 21-26.</p>
	<p>If data from your system is shared with another system or data warehouse, who is responsible for protecting the privacy of data that came from your system but now resides in another? Explain the existing privacy protections, or your plans to improve: ETO data are not transmitted, in any way, to another IT system. ETO</p>

	information is not transmitted to the DIS or the Enterprise Income Verification (EIV) systems. Outside entities do not have the capability to maintain ETO data on their external systems as they do not have the capability to interface outside software with ETO.
	Other methods of protecting privacy (specify):
	Comment:
<p>Privacy Impact Analysis: Given the access and security controls, what privacy risks were identified and describe how they were mitigated. Password protected, rights granted only to staff identified by the PHA point of contact. Staff is removed when a staff member is longer employed by grantee.</p> <p>Risk Level: There is a low risk level</p> <p>Vulnerability: Unauthorized access to system could create a risk.</p> <p>Risk Mitigation Efforts: Because of the business rules and security processes enforced in the ETO application, as well as the manual process enforced at the software provider and PHA site a low risk level is provided. Hence, each PHA is required to have personal records in ETO before an account can be created, and are granted access to only records under their specific jurisdiction. Only PHAs, the software service providers and their employees with a need-to-know are granted access privileges to ETO data. DHAP-Ike grantees are currently in the process of compiling rules of behavior forms from system users. PHAs, software service providers and their employees must agree to the HUD rules governing the protection and safeguards for protecting ETO data. The low risk exists because an approved PHA or Service Provider (must have system database/ system administrative privileges) can provide another individual access to personnel records on the local database.</p>	

Question 7: If privacy information is involved, by what data element(s) is it retrieved from the system?

Mark any that apply

<input checked="" type="checkbox"/>	Name: Public Housing Authority (PHA)/Participants
<input checked="" type="checkbox"/>	Social Security Number (SSN) DHAP-Ike Participants only
<input checked="" type="checkbox"/>	Identification number (specify type): FEMA ID
	Birth date
	Race/ ethnicity
	Marital status
	Spouse name
	Home address
	Home telephone
	Personal e-mail address
<input checked="" type="checkbox"/>	Other (specify): City/Zip code and general demographic characteristics
	None

X	Comment: Users can perform a search function using the data elements identified above.
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Question 8: What type of Notice(s) are provided to the individual on the scope of information collected, the opportunity to consent to uses of said information, the opportunity to decline to provide information.

- a. Was any form of notice provided to the individual prior to collection of information? If yes, please provide a copy of the notice as an appendix. (A notice may include a posted privacy policy, a Privacy Act notice on form(s), and/or a system of records notice published in the Federal Register.) If notice was not published, why not?**

Prior to starting the DHAP-Ike program, families are provided with a Certification of Family Obligations to complete stating their acceptance and adherence to follow the guidelines of the program to receive rental housing assistance. As well, every member in the household over the age of 18 signs the HUD Form 9886, which is the “Authorization for the Release of Information including a Privacy Act Notice when they become participants of the Ike program that outlines the authoritative purposes and how HUD plans to use and disclose such information. Further, the Head of Household completes a Release of Information form specific to the agency providing housing assistance/case management services. This system is also subjected to System of Records requirements under the Privacy Act. The SORN that the system falls under will be published in the Federal Register by November 30, 2010.

On the ETO website, there is a Paperwork Reduction Act Notice from the OMB as follows: Paperwork Reduction Act: The information collection contained in this system has been submitted to the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C 3520) and been approved under OMB Control Number 2577-0258. Families have to fill out a “Certification of Family Obligations” form

- b. Do individuals have an opportunity and/or right to decline to provide information?**

Families have the option not to participate in the DHAP-Ike. There is a Certification of Family Obligations the Head of Household signs to accept or decline DHAP- Ike assistance. If the family declines to participate, they are unable to receive assistance. As indicated in question 5, participants do have the choice not to provide certain information.

- c. Do individuals have an opportunity to consent to particular uses of the information, and if so, what is the procedure by which an individual would provide such consent?**

Yes. Families have to fill out a “Certification of Family Obligations” form stating they will follow the guidelines of the program to receive housing assistance. As well, every member in the household over the age of 18 signs the HUD Form 9886, which is the “Authorization for the Release of Information/Privacy Act Notice when they become participants of the Ike program that provide participants with the opportunity to consent to a particular use. Further, the Head of Household completes a Release of Information form specific to the agency providing housing assistance/case management services. If a particular use changes or updates are applied the appropriate forms will be updated to inform participants accordingly.

SECTION 3 - DETERMINATION BY CHIEF PRIVACY OFFICER

The PIA is based on proper implementation of privacy safeguard and protection requirements. The records in the system contain an informational message that users must comply with under the Privacy Act of 1974. Additionally, system users are required to complete and sign HUD’s rules of behavior form prior to gaining system access. The HUD Form 9886 contains the Privacy Act Statement, participants disclosure of their personal information is voluntary; however, failure to provide the requested information may impede, or prevent, further processing of requests under the DHAP-Ike Program or termination from the program. Accounts are created using a user ID and passwords and access is granted authorized users of the DHAP-Ike program.